IN RE:

RANDALL SCOTT MCKILLOP : BK. No. 1:17-bk-00749-RNO

LISA MARIE MCKILLOP :

Debtors : Chapter No. 13

:

WELLS FARGO BANK, N.A. :

v.

Movant :

:

RANDALL SCOTT MCKILLOP : 11 U.S.C. §362

LISA MARIE MCKILLOP :

Respondents

MOTION OF WELLS FARGO BANK, N.A. TO CONTINUE HEARING ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO January 25, 2018

Movant, by its attorneys, PHELAN, HALLINAN, DIAMOND & JONES LLP, hereby requests that this Honorable Court continue the hearing on Motion for Relief from the Automatic Stay, and in support thereof, avers as follows:

- 1. A hearing is scheduled for December 21, 2017 on the Motion for Relief filed on behalf of WELLS FARGO BANK, N.A..
 - 2. On or about November 8, 2017, Movant filed a Motion for Relief.
- 3. On or about November 13, 2017, Respondents' counsel filed a response to the Motion for Relief.
 - 4. On or about November 28, 2017, the hearing on the Motion for Relief was continued.
- 5. The parties are in agreement that the hearing on the Motion for Relief should be continued due to the fact parties are attempting to negotiate a settlement.
- 6. Movant therefore respectfully requests a postponement of the hearing scheduled for December 21, 2017 to January 25, 2018.

WHEREFORE, Movant respectfully requests that this Court enter an Order continuing the hearing on the Motion for Relief from the Automatic Stay to January 25, 2018 hearing date.

Dated: December 19, 2017

/s/ Thomas Song, Esquire
Thomas Song, Esq., Id. No. 89834
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Phone Number: 215-563-7000 Ext 31387

Fax Number: 215-568-7616

Email: Thomas.song@phelanhallinan.com

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Respondents

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2017, I caused to be mailed a true and correct copy of the Motion of **WELLS FARGO BANK**, **N.A.** to Continue Hearing on Motion for Relief from the Automatic Stay to January 25, 2018 to the following individuals at the addresses listed below by First Class Mail or electronic means:

CHARLES J. DEHART, III, ESQUIRE (TRUSTEE)
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036
LISA MARIE MCKILLOP
548 SWEETWATER DRIVE
PALMYRA, PA 17078

KARA KATHERINE GENDRON, ESQUIRE
RANDALL SCOTT MCKILLOP
548 SWEETWATER DRIVE
HARRISBURG, PA 17101
PALMYRA, PA 17078

UNITED STATES TRUSTEE 228 WALNUT STREET, SUITE 1190 HARRISBURG, PA 17108

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP 1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31387

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WELLS FARGO BANK, N.A. :

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RANDALL SCOTT MCKILLOP : 11 U.S.C. §362

LISA MARIE MCKILLOP :

Respondents

ORDER GRANTING MOTION OF WELLS FARGO BANK, N.A.TO CONTINUE HEARING ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO January 25, 2018

Upon consideration of the Movant's Motion to Continue Hearing on the Motion for Relief from the Automatic Stay, and there being no objection by the Debtors, it is hereby

ORDERED that the hearing scheduled for December 21, 2017, is continued to January 25, 2018.

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Respondents

CERTIFICATE OF CONCURRENCE

I hereby certify that on December 19, 2017, I have concurrence that the hearing on the Motion for Relief from Automatic Stay filed on behalf of **WELLS FARGO BANK, N.A.** may be continued.

Dated: December 19, 2017, 2017

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP 1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Phone Number: 215-563-7000 Ext 31387

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